

WASHINGTON, DC OFFICE
601 NEW JERSEY AVENUE, NW, SUITE 620
WASHINGTON, DC 20001

TEL: (202) 875-8000
FAX: (202) 844-3500

Via ECF

Honorable Vincent L. Briccetti
United States District Judge
Southern District of New York
300 Quarropas Street, Room 100
White Plains, New York 10606

APPLICATION GRANTED.

All deadlines in this case are stayed through 5/22/2020.

By 5/26/2020, the parties shall file either a proposed stipulation of dismissal or a further update regarding the status of settlement.

Chambers will mail a copy of this Order to pro se defendant Carl F. Marin at the address on the docket.

SO ORDERED:



Vincent L. Briccetti, U.S.D.J.
May 12, 2020

Re: United States of America v. Marin, et al. (SDNY 18-9307)

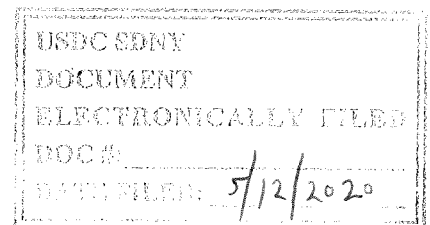
Dear Judge Briccetti:

We represent Carla Marin and the Estate of Ana Beatriz Marin (collectively the "Estate Defendants") in the above-referenced action. We write to notify the Court that the Estate Defendants have reached a settlement in principle with Plaintiff, the United States, to resolve this action.¹

We also write to respectfully request that the Court stay this action through and including May 22, 2020 to allow time for the parties to finalize their settlement agreement, and that all pending deadlines in this case, including for the Estate Defendants' response to the United States' motion to appoint a receiver, be tolled during the pendency of the stay. While the Estate Defendants are aware of this Court's notice that it would "not further extend the Estate Defendants' time to oppose the [receiver] motion," Doc. No. 152, the Estate Defendants respectfully request that the Court allow the deadline for the Estate Defendants' response to be tolled during the requested stay so that the Estate Defendants are not required to expend resources responding to a motion that will likely become moot upon the anticipated finalization of the settlement agreement.

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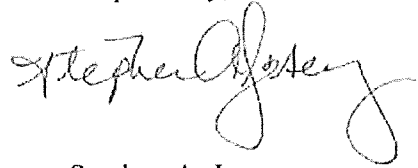
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¹ The Estate Defendants have also reached a settlement in principle of its state estate tax debt with defendant, the State of New York, which was added as a party that may claim an interest in the properties that are the subject of the United States' foreclosure claim. The Court entered a stipulation and order allowing the State of New York to refrain from active participation in this matter. Doc. Nos. 145, 146. Even though it is not actively participating in this action, the State of New York also consents to the requested stay.

This case was previously stayed pending settlement negotiations from October 28, 2019 through December 26, 2019. The Estate Defendants, with the consent of the United States, also sought a stay of discovery in March 2020, which the Court denied; however, the Court subsequently entered a revised civil case discovery plan and scheduling order that extended discovery deadlines. Counsel for the Estate Defendants have conferred with the United States, which consents to the requested stay. Defendant Carl Marin, also consents to the requested relief.

Respectfully,

A handwritten signature in black ink, appearing to read "Stephen A. Josey". The signature is fluid and cursive, with a large, stylized "S" and "J".

Stephen A. Josey
Megan L. Brackney
sjosey@kflaw.com

cc:

Samuel Dolinger (*counsel for the United States*) (via ECF)

Carl Marin (via email)